

Exhibit F

From: Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com>
Sent: Monday, July 29, 2024 11:51 AM
To: Dominic Hamden <dominic@hamdenlaw.com>; Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>
Cc: Jodi Smiley <jodi@hamdenlaw.com>
Subject: RE: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology

Any update, Dominic?



Stephanie Peet (She/Her)
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From: Dominic Hamden <dominic@hamdenlaw.com>
Sent: Thursday, July 18, 2024 10:34 AM
To: Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>
Cc: Jodi Smiley <jodi@hamdenlaw.com>; Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com>
Subject: Re: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology



sorry I have been bogged down the last few days. I am going to try and speak to my client this afternoon.

On Thu, Jul 18, 2024 at 10:22 AM Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com> wrote:

Dominic,

We still have not heard from you. Please let us know your client's position.

Thanks,



Margaret V. Zazulak

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From: Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>

Sent: Wednesday, July 10, 2024 11:20 AM

To: Dominic Hamden <dominic@hamdenlaw.com>

Cc: Jodi Smiley <jodi@hamdenlaw.com>; Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com>

Subject: RE: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology

Dominic,

I am following up here on the request for information and my e-mail below. Please let us know if Transnational will provide the information for the 12 names in response to the subpoena. If not, we will seek court involvement.



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From: Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>
Sent: Tuesday, July 2, 2024 9:16 AM
To: Dominic Hamden <dominic@hamdenlaw.com>; Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com>
Cc: Jodi Smiley <jodi@hamdenlaw.com>
Subject: RE: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology

Dominic,

Our client's procurement representative spoke with the representative from Transnational last week and this is what he told us:

I talked to Transnational today, they said that if we get a "Subpeona" they will give us the information at no charge.



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From: Dominic Hamden <dominic@hamdenlaw.com>
Sent: Monday, July 1, 2024 6:27 PM
To: Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com>
Cc: Jodi Smiley <jodi@hamdenlaw.com>; Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>
Subject: Re: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology

Please forward that correspondence because I do not believe it came from my or my client's office.

On Mon, Jul 1, 2024, 6:02 PM Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com> wrote:

We are confused. Transnational said Syncreon would not have to pay if it issued a subpoena. So it did.

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From: Dominic Hamden <dominic@hamdenlaw.com>

Sent: Monday, July 1, 2024 5:54:40 PM

To: Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com>

Cc: Jodi Smiley <jodi@hamdenlaw.com>; Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>

Subject: Re: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology

Are you willing to compensate my client for the time spent to complete their search?

On Mon, Jul 1, 2024, 5:42 PM Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com> wrote:

Dominic- If I recall correctly, your client required a subpoena. And if I also recall correctly, your client is seeking compensation for 9 hours of work. Syncreon has requested addresses for 12 of its workers. I'm not sure I understand how that takes 1 hour, let alone 9. While I understand there is a short turnaround- again, this is by court directive and not by our choice. If your client is willing to provide this contact information, wonderful. If your client is standing with its objection, we will seek court involvement.

Thanks.

Stephanie Peet (She/Her)

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From: Dominic Hamden <dominic@hamdenlaw.com>
Sent: Monday, July 1, 2024 4:46:34 PM
To: Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com>
Cc: Jodi Smiley <jodi@hamdenlaw.com>; Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>
Subject: Re: FW: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology

My client is not being an obstructionist

You were advised that my client would be requesting compensation for their time and expenses. This is not an unusual request. Instead of responding to my client's request, you issued a subpoena with 8 days turn around over a holiday weekend.

FRCP 45 provides for compensation for a subpoena that is issued as well, including for fees for a request that is unduly burdensome.

Further, FRCP 45 is clear that the district court where compliance is sought has jurisdiction (in this case the Eastern District of Michigan - not Pennsylvania).

Dominic

On Mon, Jul 1, 2024, 3:45 PM Peet, Stephanie J. (Philadelphia) <stephanie.peet@jacksonlewis.com> wrote:

Dominic-

I called to discuss your objection but have been advised you are out of the office. Candidly, I am not sure I understand the need for Transnational's obstructionist position. We settled a class action involving a number of syncreon's direct workers and temporary workers. There are numerous staffing agencies involved; not just Transnational. We are obligated to send notice out to the class members regarding the settlement, but as you know, syncreon does not possess the contact information for the temporary workers. For the Transnational

workers, that information is in the possession of Transnational. We are simply asking Transnational to provide the contact information for the 12 people we have identified. No other staffing agency has objected. We apologize for the quick turnaround, but we are following a court directive.

If you refuse to provide this information, we will notify the court of your client's position and you and your client can explain to Judge Kenney why it will not share contact information for 12 of its employees as part of a court-approved settlement.

I'm available by phone if you would like to discuss.

Stephanie Peet (She/Her)

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From: Jodi Smiley <jodi@hamdenlaw.com>

Sent: Monday, July 1, 2024 2:28 PM

To: Zazulak, Margaret V. (New Orleans) <Margaret.Zazulak@jacksonlewis.com>

Cc: Dominic Hamden <dominic@hamdenlaw.com>

Subject: Case No. 2:23-cv-04561 Ayala v Transnational Staffing/Syncreon Technology

Good Afternoon,

Attached hereto is our service for Mr. Hamdens's Objection to Subpoena to Produce Documents for the above referenced case.

Thank you,

Jodi Smiley

Legal Assistant

Law Offices of Dominic Hamden, PLLC

734-439-8884

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Thanks,

Dominic N. Hamden
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